A05-0011



# National Environmental Achievement Track

## Application Form

Madison Chemical Co., Inc.
Name of facility
Same
Name of parent company (if any)
3141 Clifty Drive
Street address
P.O. Box 1599
Street address (continued)
Madison, In 47250-0599
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Sam George

Vice President and Director of Corporate Affairs

Phone 812-273-6000

812-273-6002

E-mail mcc@seidata.com

EPA needs background information on your facility to evaluate your application.

## What do you need to do?

- · Provide background information on your facility.
- · Identify your environmental requirements.



1	What do you do or make at your facility?	Madison Chemical manufacturers specialty chemicals including hard surface cleaners, used during pre-paint applications in metal and plastic fabrication. Additionally, we manufacture cleaners and sanitizers used by food processors, paper makers, and the transportation industry.
2	List the Standard Industrial Classification (SIC) code(s) or North American Industrial	SIC 2841 2842 2899
	Classification System (NAICS) codes that you use to classify business at your facility.	NAICS 325611 325612 325551
3	Does your company meet the Small Business Administration definition of a small business for your sector?	
4	How many employees (full-time equivalents)	Fewer than 50
	currently work at your facility?	☑ 50-99
		100-499
		□ 500-1,000
		More than 1,000

5	Does your facility have an EPA ID number(s)?  If yes, list in the right-hand column.	⊠ Yes IND006382667	□ No
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right <b>or</b> enclose a completed Checklist with your application.	Check list end	closed.
7	Check the appropriate box in the right-hand column.		he requirements above. ed the Checklist with my
8	Optional: Is there anything else you would like to tell us about your facility?	Management for Pollution Pr Madison Cher Awards for P2 In 1999, we we we are the on record. We tr carcinogens of customer's plot waste streams chemical subst customers, the benefit from a solving. We p program, and	epartment of Environmental sponsors annual Governor's Awards revention (P2) and Recycling. Mical has won three Governor's and one for our recycling program. On both awards in the same year and some some sponsor with such a company sponsor our series and eleminating hazardous some some some some some some some som

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

## What do you need to do?

- Confirm that your EMS meets the Achievemen
- or

	committee from Ende moore the morning
	Track requirements.
•	Tell us if you have completed a self-assessment
	have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements

	for each element below as defined in the instructions.			
	a. Environmental policy	⊠ Yes	;	
	b. Planning	⊠ Yes	<b>;</b>	
	$\it c$ . Implementation and operation	X Yes	5	
	$\emph{d}$ . Checking and corrective action	X Yes	5	
	e. Management review	⊠ Ye:	5	
2	Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Ye	5	
3	Did this cycle include both an EMS and a compliance audit?	⊠ Ye	5	
4	Have you completed an objective self- assessment or	⊠ Ye	S	
	third-party assessment of your EMS?	⊠ Sel	f-assessment	
	If yes, what method of EMS assessment did you use?		☐ GEMI	☑ Other
			☐ CEMP rnization and T ed our EMS.	Indiana Business Technology Program has
		🛛 Thi	rd-party assess	ment
			⊠ ISO 14001	Certification
			Other	

Section B

Tell us about your EMS.

Facilities must show that they are committed to improving their environmental performance. This med that you can describe past achievements and will madure commitments.

#### What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



Tell us about your past achievements and future commitments.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	(2 years ago)?		What is the current level?	
BOD Discharges to Water	Quantity 20,000	Units pounds	Quantity 11,000	Units pounds

- i. How is the current level an improvement over the previous level?
  - BOD reduction reduces the stress on the local POTW to treat the waste.
- ii. How did you achieve this improvement?
  - Better inventory control.

Second aspect you've selected

What aspect have you selected? Solid Waste Generation		What was the previous level (2 years ago)?		What is the current level?	
		Quantity 756	Units Cubic Yards	Quantity 420	Units Cubic Yards
i.	i. How is the current level an improvement over the previous level?				
	We have reduced waste ser		nearly 45%.		
ii.	How did you achieve th	is improvement?			
	Recycling, better purche types of non-recyclable	• .	nd installation of a	permitted inciner	ator for selected

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

## First aspect you've selected

a. What is the aspect?	BOD discharges to water	
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	11,000 pounds per year
production or output.	Option B: In terms of	(Quantity/Units)
	units of production or output	(Quantity/Units)

<ul> <li>d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.</li> <li>e. How will you achieve this improvement?</li> </ul>	<ul> <li>✓ Option A:         <ul> <li>Absolute value</li> </ul> </li> <li>✓ Option B:         <ul> <li>In terms of</li> <li>units of production</li> <li>or output</li> </ul> </li> <li>Continued inventory cont</li> </ul>	7,500 pounds per year (Quantity/Units)  (Quantity/Units)  rol, better manufacturing
Second aspect you've selected	practices, more careful pi	
a. What is the aspect?	Total solid waste generati	on
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	⊠ Yes □ No	
<ul> <li>c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.</li> </ul>	Option A: Absolute value  Option B: In terms of units of production or output	456 cubic yards/year (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value  Option B: In terms of units of production or output	300 cubic yards/year (Quantity/Units) (Quantity/Units)
e. How will you achieve this improvement?	Smarter purchasing, less precyclable containers.	oackaging material, more

Third aspect you've selected		
a. What is the aspect?	Emissions of VOC	
b. Is this aspect identified as significant in your EMS?	☐ Yes ⊠ No	
<ul> <li>c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.</li> </ul>	Option A: Absolute value  Option B: In terms of units of production or output	Less than 1 ton/year (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value  Option B: In terms of units of production or output	Less than 500 pounds/year (Quantity/Units)
e. How will you achieve this improvement?  Fourth aspect you've selected	Raw material substitution.	
a. What is the aspect?	Hazardous material use.	
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	☐ Yes ☒ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	5,000,000 pounds/year
production or output.	Option B: In terms of units of production or output	(Quantity/Units)

e. How will you achieve this improvement?	Raw material substitution.

Facilities must demonstrate their commitment to public outreach and performance reporting. You should hav appropriate mechanisms in place to identify communicatems, to communicate with the public, and to proinformation on your environmental performance.

# Section D

Tell us about your public outreach and reporting.

#### What do you need to do?

- · Describe your approach to public outreach.
- List three references who are familiar with your facility.
- 1 How do you identify and respond to community concerns?

2 How do you inform community members of important matters that affect them?

3 How will you make the Achievement Track Annual Performance Report available to the public? We participate in our local emergency planning committee (LEPC) and in other industry health and safety committees. We host visits from emergency responders, conduct drills with community groups, and sponsor health and safety training in the community. We provide CPR training in schools. These contacts allow the community opportunity to raise issues about our business.

Through the LEPC, we appear at public meetings and mail committee minutes each month. We have sponsored public meetings and had articles in the local paper about hazardous materials planning, and commodity flow studies. We have also conducted and publicized plume modeling to show the effects of unplanned releases even though we are not a 112 r facility. Also, we have mailed copies of our environmental policy to many facilities in our county encouraging them to pursue ISO 14001 registration.

- ☐ Website www.madchem.com
- ☐ Open Houses
- ☑ Other

Discussions at LEPC meetings and meetings of the local Environmental Roundtable.

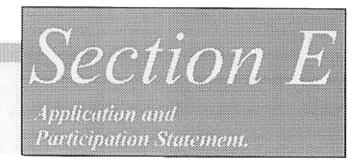
4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ No	
	If yes, describe briefly in the right-hand column.			

## 5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Red Cross	Tiffani Mundt	812-265-3818
State/Local Regulator	Indiana Dept of Environmental Mgt.	John Chavez	317-233-6661
Other community/local reference	City of Madison	Al Huntington, Mayor	812-265-8300

On behalf of Madison Chemical Co., Inc. [my facility],

certify that



I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

Sam George 9/22/00

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Sam George, JD, CHMM, Vice President

Facility Name Madison Chemical Co., Inc.

Facility Street Address 3141 Clifty Drive, P.o. Box 1599, Madison, IN 47250-0599

Facility ID Numbers IND 006382667

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

## National Environmental Achievement Track

## Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Na	me: Madison Chemical Co., Inc	_
	3141 Clifty Drive, Madison, IN 472	50
Facility Loc	IND 006382667	-
Facility ID		-
(anach aaai	tional sheets if necessary)	
Air Pollution	n Regulations	Check All That Apply
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	
2.	Permits and Registration of Air Pollution Sources	9
3.	General Emission Standards, Prohibitions and Restrictions	
4.	Control of Incinerators	
5.	Process Industry Emission Standards	
6.	Control of Fuel Burning Equipment	
7.	Control of VOCs	
8.	Sampling, Testing and Reporting	
9.	Visible Emissions Standards	
10.	Control of Fugitive Dust	
11.	Toxic Air Pollutants Control	
12.	Vehicle Emissions Inspections and Testing	
Othe	r Federal, State, Tribal or Local Air Pollution Regulations Not Listed	Above (identify
13.		
14.		

## **Hazardous Waste Management Regulations**

1	Identification and Listing of Hazardous Waste (40 CFR 261)	
	- Characteristic Waste	
	- Listed Waste	<u> </u>
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
	- Manifesting	
	- Pre-transport requirements	
	- Record keeping/reporting	
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
	- Transfer facility requirements	
	- Manifest system and record-keeping	
	- Hazardous waste discharges	
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
	- General facility standards	
	- Preparedness and prevention	
	- Contingency plan and emergency procedures	
	- Manifest system, Record keeping and reporting	
	- Groundwater protection	
	- Financial requirements	
	- Use and management of containers	
	- Tanks	
	- Waste piles	
	- Land treatment	
	- Incinerators	
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste	
	Land Disposal Facilities (40 CFR 267)	
<b>7</b> .	Administered Permit Program (Part B) (40 CFR 270)	
041	on Federal Class Tribal and coal Herondon, W. et. M	<b>N7</b> 4
	er Federal, State, Tribal or Local Hazardous Waste Management Regulationed Above (identify)	ns Not
List	ed Above (taentijy)	
8.		
0.		
9.		
<b>,</b>		
Hazardous	Materials Management	
	<del> </del>	
1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	
2.	Designation of Reportable Quantities and Notification of Hazardous	_
	Materials Spill (40 CFR 302)	
3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	
4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	
5.	Community Right-to-Know Regulations (40 CFR 350-372)	

6.		
7.		
<u>Waste</u>	Management	
1.	Criteria for Classification of Solid Waste Disposal Facilities	
	and Practices (40 CFR 257)	
2.	Permit Requirements for Solid Waste Disposal Facilities	
3.	Installation of Systems of Refuse Disposal	
4.	Solid Waste Storage and Removal Requirements	
5.	Disposal Requirements for Special Wastes	
Otho Abo	er Federal, State, Tribal or Local Solid Waste Management Regulations Not Live (identify)	sted
6.		
7.		
1. 2.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116)	
3.	Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)	
4.	NPDES Permit Requirements (40 CFR 122)	
5.	Toxic Pollutant Effluent Standards (40 CFR 129)	
6.		
	General Pretreatment Regulations for Existing and New Sources (40 CFR 403)	G G
7.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines	
7. 8.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines	_
	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards	
8.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)	
8. 9.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards	
8. 9. 10.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards Effluent Limitations for Direct Dischargers	0 0 0 0 0
8. 9. 10. 11.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards Effluent Limitations for Direct Dischargers Permit Monitoring/Reporting Requirements Classifications and Certifications of Operators and Superintendents	0 0000
8. 9. 10. 11. 12. 13.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards Effluent Limitations for Direct Dischargers Permit Monitoring/Reporting Requirements Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants	0 0000 0
8. 9. 10. 11. 12. 13.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards Effluent Limitations for Direct Dischargers Permit Monitoring/Reporting Requirements Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants Collection, Handling, Processing of Sewage Sludge	0 0000
8. 9. 10. 11. 12. 13.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) Water Quality Standards Effluent Limitations for Direct Dischargers Permit Monitoring/Reporting Requirements Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants	0 0000 0

17.		
18.		
ing Wa	ter Regulations	
1.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)	
2.	National Primary Drinking Water Standards (40 CFR 141)	
3.	Community Water Systems, Monitoring and Reporting Requirements	_
4	(40 CFR 141)	
4.	Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources	
5.	Underground Injection Control Requirements	
6.	Monitoring, Reporting and Record keeping Requirements for Community	
	Water Systems	
Othe	r Federal, State, Tribal or Local Drinking Water Regulations Not Listed Abo	ve
(iden	tify)	
7		
8.		
Substa	ances_	
1.	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	<b>-</b>
2.	Import and Export of Chemicals (40 CFR 707)	
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	
4.	Chemical Information Rules (40 CFR 712)	
5.	Health and Safety Data Reporting (40 CFR 716)	
6.	Pre-Manufacture Notifications (40 CFR 720)	Ē
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761) Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)	
8. 9.	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	
<b>9.</b>	Storage and Disposar of Waste Material Containing 1000 (40 CFR 775)	-
Othe (iden	er Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Abatify)	ove
10.		
11		

## Pesticide Regulations

1.	FIFRA Pesticide Use Classification (40 CFR 162)	
2.	Procedures for Disposal and Storage of Pesticides and Containers	
	(40 CFR 165)	
3.	Certification of Pesticide Applications (40 CFR 171)	
4.	Pesticide Licensing Requirements	
5.	Labeling of Pesticides	
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	
7.	Disposal of Pesticide Containers	
8.	Restricted Use and Prohibited Pesticides	
Othe	er Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	(identify)
9.		
10.		_
10.		
1073 ·		
Environmen	tal Clean-Up, Restoration, Corrective Action	
1.	Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
2	POPA G. di Adi di	_
2.	RCRA Corrective Action (identify)	
		_
Othe Actio	r Federal, State, Tribal or Local Environmental Clean-Up, Restoration, C on Regulations Not Listed Above <i>(identify)</i>	orrective
3.		
4.		
•		

Fax (812) 273-6002 Phone (812) 273-6000



## CHEMICAL CO., INC.

P.O. Box 1599 • Madison, Indiana 47250-0599

## FACSIMILE TRANSMISSION

TO:	Ms. Emily Levi	15		
FIRM:				
FROM:	Mr. Sam George			
DATE:	11/17/00	REMARKS:		
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~				
NUMBER OF	PAGES INCLUDIN	G COVER SHEET:	4 IF YOU DO I	NOT
		HIS TRANSMISSION, PLE	EASE CALL 812-273-600	10
AS SOON AS	POSSIBLE.		ISC) 9001-94	
		<del></del>		REGISTERED QUALITY
			The state of the s	CERTIFICATE 0021

## Second aspect you've selected

What is the current level? What was the previous level What aspect have (2 years ago)? you selected? Units Quantity Units Quantity Cubic Yards 420 Cubic Yards **7**56 Solid Waste Generation i. How is the current level an improvement over the previous level? We have reduced waste sent of landfill by nearly 45%. ii. How did you achieve this improvement? Recycling, better purchasing practices and installation of a permitted incinerator for selected types of non-recyclable paper. 40% of reduction is from recycling and 30% from each of better purchasing

and incineration. Please see attachment dated 11/17/00.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

## First aspect you've selected

a. What is the aspect?	BOD discharges to water	
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	∑ Yes  ☐ No	
c. What is the current level? You may choose to state	Option A: Absolute value	11,000 pounds per year
this as an absolute value or in terms of units of production or output.	Option B: In terms of	(Quantity/Units)
	units of production or output	(Quantity/Units)

Fax (812) 273-6002 Phone (812) 273-6000



## CHEMICAL CO., INC.

P.O. Box 1599 • Madison, Indiana 47250-0599

November 17, 2000

TO: Mark Mesersmith, US EPA

Emily Levin, Ind. Eco. Corp.

mb lear se

FR: Sam George 5

VIA: FAX

**RE: NEAT Application** 

- 1. I checked with Mr. Steve Hale, our chief chemist who handles all pesticide reporting. Your reviewer was quite correct that we are covered by FIFRA. We file applicable reports for pesticide sales and follow rules and regulations for labeling and licensing. I failed to mark the appropriate boxes on the checklist.
- 2. We have reduced solid waste generation from 756 cubic yards to 420 cubic yards, a 45% reduction. About 40% of this reduction is due to our recycling program. We recycle cardboard at a rate of 6 cubic yards per month. This amounts to a 72 cubic yard per year reduction from our levels two years ago (756 cubic yards). We collect office paper, slick paper, and magazines in 2.37 cubic yard bins (bins are cubic, 4 feet on each edge). We deliver these bins to the recycling center every 6 weeks or 8.67 times per year. Three bins at 2.37 cubic yards every 6 weeks amounts to 61 cubic yards per year removed from the solid waste stream. Therefore, our recycling effort has reduced the waste stream from 756 cubic yards annually to 623 cubic yards reduction from recycling of 18%. The rest of the reduction is probably split fairly evenly (30% each) between incineration and source reduction. We purchase and dispose of fewer pallets, for instance, than before our program began. The only item we generally incinerate is the paper bags of some of our raw materials. I have amended page 6 of our application.

Please let me know if this information is sufficient. I have taken the liberty of faxing it to Ms. Levin to hasten your consideration of our application.

Thank you for your assistance.

ISO 9001-94

## Pesticide Regulations

	1.	FIFRA Pesticide Use Classification (40 CFR 162)	
	2.	Procedures for Disposal and Storage of Pesticides and Containers	
		(40 CFR 165)	
	3.	Certification of Pesticide Applications (40 CFR 171)	
	4.	Pesticide Licensing Requirements	
	5.	Labeling of Pesticides	
	6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	<u> </u>
	7.	Disposal of Pesticide Containers	
	8.	Restricted Use and Prohibited Pesticides	
	Other	Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	(identify)
	9.		
	10.		
<u>Envi</u>	ronment 1.	Comprehensive Environmental Response, Compensation and Liability  Act (Superfund) (identify)	
	2.	RCRA Corrective Action (identify)	
		r Federal, State, Tribal or Local Environmental Clean-Up, Restoration, on Regulations Not Listed Above <i>(identify)</i>	Corrective
	3.		
	4.		. 🗆